

Date: Jul 06 2025

KEVIN P. WEIMER, Clerk

By: s/ Neethu Varghese  
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

ZHI DONG ZHANG.  
Defendant.

UNDER SEAL

Criminal Action No.

1:22-CR-294

**MOTION FOR LIMITED DISCLOSURE OF SEALED FIRST**  
**SUPERSEDING INDICTMENT**

The United States of America, by Theodore S. Hertzberg, United States Attorney, and Sandra E. Strippoli, Assistant United States Attorney for the Northern District of Georgia, respectfully requests that the above-styled First Superseding **Indictment**, while remaining under seal, be permitted to be disclosed to the extent and for the reasons set forth below:

The First Superseding Indictment needs to be disclosed to all Interpol member countries in connection with the issuance of an Interpol Red Notice. The Red Notice is being done in an effort to secure defendant Zhi Dong Zhang's presence in the United States to face the charges.

WHEREFORE, the United States of America respectfully requests that this First Superseding Indictment remain UNDER SEAL but that the Court order that it may be disclosed for all purposes necessary to the issuance on an Interpol Red Notice for the defendant named therein, including to all Interpol member countries.

Submitted this 6<sup>th</sup> day of July 2025.

Respectfully submitted,

THEODORE S. HERTZBERG  
*United States Attorney*

  
Sandra E. Strippoli

*Assistant United States Attorney*  
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